

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

-against-

JACOB DELANEY,

Defendant.

NOTICE OF MOTION

ORAL ARGUMENT
REQUESTED

PLEASE TAKE NOTICE, that upon the annexed Memorandum of Law and the Declaration of **Scott W. Iseman, Esq.**, attorney for the Defendant, and upon the Indictment filed against the above-named defendant in this Court, and upon the arraignment and all of the proceedings heretofore had herein, the undersigned will move this Court on February 26, 2021 to be held in and for the Northern District of New York for:

- (1) An Order, pursuant to FRCP §§ 41(h) and 12(b)(3)(c) suppressing all physical evidence seized during the execution of the search warrant on the Defendant's apartment and to suppress any statements made by the Defendant that were obtained during or after the subject search.
- (2) For such other and further relief as to this Court may seem just and proper.

The Defendant respectfully requests **ORAL ARGUMENT** on this motion.

DATED: January 26, 2021

O'CONNELL AND ARONOWITZ

By:



Scott W. Iseman, Esq.
Attorneys for Defendant
Office and P.O. Address
54 State Street
Albany, NY 12207-2501
Tel.: (518) 462-5601

CERTIFICATE OF SERVICE

I certify that on January 26, 2021, I served a copy of the foregoing, the supporting Attorney Declaration and all attached exhibits and the accompanying Memorandum of Law Assistant U.S. Attorney, Alicia Suarez and filed the same with the Court by email under seal. I further certify that on January 29, 2021, pursuant to the Court's Text Order (Ecf. Doc. No. 41), that I served redacted copies of same on all parties via ECF.

DATED: January 29, 2021

O'CONNELL AND ARONOWITZ

By:

A handwritten signature in black ink, appearing to read 'S. Iseman', written over a horizontal line.

Scott W. Iseman, Esq.
Attorneys for Defendant
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54 State Street
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